



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

OCT 09 2012

REPLY TO THE ATTENTION OF:

Stephen J. Lachance
Michigan Department of Environmental Quality
Air Quality Division
350 Ottawa Avenue Northwest, Unit 10
Grand Rapids, Michigan 49503

Dear Mr. Lachance:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), Permit Number T163-30180-00003, for Consumers Energy Company's J.H. Campbell Plant located in West Olive, Michigan. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

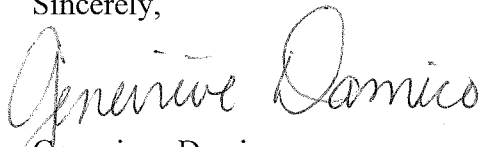
1. Because applicable requirements derived from permits issued under the Michigan State Implementation Program (SIP) do not cite individual permits as the source of those requirements, it is difficult to verify whether all applicable requirements from construction permits have been included in the draft ROP. For example, Permit to Install (PTI) 1-10 is listed on the Michigan Department of Environmental Quality (MDEQ) website as an active PTI issued since 2002, but it does not appear in Appendix 6 of the ROP, which is meant to include any ROP that has been issued since the effective date of the previous ROP. Please verify that applicable requirements from all active PTIs issued under the Michigan SIP are properly incorporated into the draft ROP. In addition, PTI 337-01 is listed on the MDEQ website as an active PTI issued since 2002; however, we understand that it has been voided. Please ensure that the electronic record of all active PTIs for the facility is up-to-date.
2. A number of conditions require the permittee to conduct and record the results of "non-certified" visual inspections for opacity.¹ Please clarify the test method and duration of such visual observations for opacity. EPA recommends that, at a minimum, the permit must specify EPA Method 22 as the acceptable test method for Visible Emissions (VE) inspections, followed by opacity measurements using EPA Method 9 if VEs are observed. Additionally, we recommend that the VE observations be conducted as part of the already required equipment inspections.

¹ e.g., Special Condition (SC) VI.3 on page 37 of the draft ROP. Also see pages 41, 45, 49, 54, among others.

3. Condition SC VI.2 on page 18 of the draft ROP states that the operation and maintenance of the dry fly ash handling system shall be consistent with the permittee's Monitoring and Malfunction Abatement Plan (MAP) for dry fly ash collection systems, "originally dated June 13, 1996, or equivalent, as approvable by the AQD District Supervisor." However, we have confirmed that a revised up-to-date MAP has been made available for public comment as part of the permit record for the current permit action. Please revise Condition SC VI.2 (page 18 of the draft ROP) to clarify that the operation and maintenance of the dry fly ash handling system shall be consistent with the updated MAP for EUASHNEW that has been made available for public comment.
4. In Part B on page 3 of the renewal application, the "Mark-up copy of existing ROP" check box is unchecked, though this content is required. In addition, Parts C, E, and H of the application have been left blank. Please clarify how MDEQ determined that the application was administratively complete upon submittal despite the missing information in the application.
5. Please include in the Staff Report a discussion on the current status of the Mercury and Air Toxics Standards rule (40 CFR Subpart UUUUU), and how MDEQ plans to incorporate applicable requirements from that standard into the permittee's ROP once those requirements become effective.
6. The capacity of boiler Emission Unit BOILER3 (EU) is listed as 8240 MMBtu/hr on page 28 of the draft ROP, and 7720 MMBtu/hr on Form EU-003 of the renewal application as well as on page 13 of PTI 179-10. Please confirm the heat input rating of EUBOILER3 and either correct the value listed in the draft ROP or provide an explanation for why the value has changed in the draft ROP.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact David Ogulei or Beau Garrett, of my staff, at (312) 353-0987 or (312) 353-4824.

Sincerely,


Genevieve Damico
Chief
Air Permits Section

cc: Teresa Seidel, MDEQ Field Operations Supervisor
Heidi Hollenbach, Grand Rapids District Supervisor